

UNITED STATES DISTRICT COURT
FILED

SOUTHERN

DISTRICT OF 04 AUG -4 AM 9:30 CALIFORNIA

In the Matter of the Search of
(Name, address or brief description of person or property to be searched)CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIAPremises located at
16870 West Bernardo Drive, Suite 400
San Diego, California 92127BY: DEPUTY
APPLICATION AND AFFIDAVIT FOR
SEARCH WARRANT
CASE NUMBER: 04 mg 1851I Brian C. Nielsen being duly sworn depose and say:

I am a(n) Special Agent of the Federal Bureau of Investigation (FBI) and have reason to believe that on the person of or X on the property or premises known as: 16870 West Bernardo Drive, Suite 400, San Diego, California in the SOUTHERN District of CALIFORNIA

which is more fully described in Attachment A, incorporated by reference herein. There is now concealed property which is described in Attachment B, incorporated by reference herein.

Which is (state one or more bases for search and seizure set forth under Rule 41(b) of the Federal Rules of Cr property that constitutes evidence of the commission of a criminal offense, contraband, the fruits of crime, things otherwise criminally possessed and property designed and intended for use and which is and has been used as the means for committing a criminal offense.

concerning a violation of Title 18 United States Code, Section(s) 1343, 1956, and 371 and Title 15 United States Code, Section(s) 78j(b) and 77(q)(a). The facts to support a finding of Probable Cause are as follows:

See attached affidavit of Special Agent Brian C. Nielsen.

Continued on the attached sheet(s) and made a part thereof. XX Yes No

Brian C. Nielsen
Signature of Affiant

Sworn to before me, and subscribed in my presence

7/29/04
Date
LOUISA S. PORTER
U.S. MAGISTRATE JUDGE

Name and Title of Judicial Officer

at San Diego, California
City and State

Signature of Judicial Officer

AFFIDAVIT

County of San Diego)

) ss.

State of California)

I, BRIAN C. NIELSEN, being duly sworn, state as follows:

INTRODUCTION

1. I am a Special Agent employed by the Federal Bureau of Investigation (FBI), assigned to the San Diego Division, at San Diego, California. I have been employed as a Special Agent for approximately two years and six months and have been assigned to the investigation of Computer Crime cases, including computer fraud, computer intrusions, Internet fraud, Internet Identification theft, and numerous other schemes related to computer crimes and financial fraud.

2. I have assisted in the execution of numerous arrests and search warrants over the course of my career in these investigations.

3. I am currently involved in a joint investigation being conducted by the FBI and the Division of Enforcement of the Securities and Exchange Commission (SEC).

4. Based upon my training and experience, a review of documents and other relevant information I believe to be reliable, and discussion with other law enforcement agents and representatives of the SEC, I believe that there is probable cause that PHUONG HUYNH has violated federal law, including:

1 A. Wire Fraud, in violation of Title 18, United States
2 Code, Section 1343;

3 B. Money Laundering, in violation of Title 18, United
4 States Code, Section 1956;

5 C. Fraud in connection with the purchase or sale of any
6 security in interstate commerce, in violation of Title 15, United
7 States Code Section 78j(b) and Rule 10 b-5.

8 D. Fraud in connection with the offer or sale of
9 securities in interstate commerce, in violation of Title 15, United
10 States Section 77(q)(a).

11 E. Conspiracy to commit the above offenses, in violation
12 of Title 18, United States Code, Section 371.

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FACTS AND CIRCUMSTANCES

5. I have been advised by Michael Juliano, Staff Attorney, SEC Division of Enforcement, that Robert and Eileen Gilmore (the Gilmores) residing at 17899 Joyas Court, Poway, California 92064 reported a complaint on May 5, 2004 that PHUONG LAN THI "LANA" HUYNH (HUYNH), a California based broker residing at 12416 Ragweed Street, San Diego, California 92129, had misappropriated over \$2,500,000 in funds that HUYNH controlled as the founder and chair of International Capital Group Securities Ltd (ICG), International Capital Group LLC (ICG LLC), IN2 Technologies Inc (IN2), and i2 Cyber Education Inc (i2).

6. On July 16, 2004, your affiant interviewed the Gilmores at the FBI San Diego Office at 9797 Aero Drive, San Diego, California. During the course of the interview, the Gilmores told your affiant the following:

a. In December 2001, Eileen Gilmore (Eileen) asked HUYNH for investment assistance in establishing a long-term, diverse portfolio with dividend-paying stocks. HUYNH agreed to become the Gilmores' broker/dealer through ICG. HUYNH told Eileen that she would not charge commission on stock trades, but Eileen would have to invest at least one million dollars and the account would be "long term." For Eileen to purchase a stock through ICG, HUYNH requested Eileen write a check with the name of the stock in the "Memo" line of the check. HUYNH requested that the "Payee" line be left blank because HUYNH was not sure which clearing house she would use (reference Exhibit A). HUYNH agreed to provide biannual "statements" that would reflect Eileen's stock positions with ICG. HUYNH eventually provided quarterly "statements" reflecting

1 Eileen's stock positions. HUYNH hand delivered these fabricated
2 "statements" to Eileen on her way to work at Eileen's residence
3 (reference Exhibit B). Eileen reviewed these statements and
4 believed they reflected the stock positions that she requested
5 HUYNH to purchase.

6 b. HUYNH provided the Gilmores' tax accountant, Dwight
7 DeSantis, written and computer generated ICG account statements for
8 tax return purposes for the tax years 2002 and 2003. These
9 statements were provided via facsimile or hand-delivered by Robert
10 Gilmore.

11 c. From December 2001 through December 2003, Eileen
12 provided HUYNH with over \$2,513,000 in checks, noting only the name
13 or ticker symbol of the intended investment on the "Memo" line of
14 the check while leaving the "Payee" line blank. When these checks
15 cleared, Eileen found that "Lan Huynh," "Lana Huynh," "ICG," or "i2
16 Cyber" appeared in the "Payee" line of the cleared checks
17 (reference Exhibit A).

18 d. Over the two year period from December 2001 to
19 December 2003, HUYNH paid Eileen approximately \$150,000 in
20 "dividend" payments in the form of cashiers checks or certified
21 checks (reference Exhibit C).

22 e. In December 2003, Eileen wrote a letter dated December
23 11, 2003 requesting that HUYNH wire \$150,000, representing a
24 portion of Eileen's "accrued dividends" for 2003, to the Gilmores'
25 Wells Fargo bank account in Poway, California. Eileen subsequently
26 received an unexpected telephone call from Deutsche Bank
27 representative Donald Conrad. Conrad is the Gilmores' broker for
28 their Alex Brown/Deutsche Bank brokerage account. Conrad called to

1 confirm the validity of a facsimile request dated December 17, 2003
2 that had been purportedly sent from the Gilmores' facsimile machine
3 requesting Deutsche Bank to wire \$150,000 to the Gilmores' Wells
4 Fargo bank account. Eileen denied making the request and ordered
5 that the \$150,000 remain in the Deutsche Bank account. Conrad
6 provided Eileen a copy of the facsimile request he had received
7 (reference Exhibit D). Eileen reviewed the request and found it
8 was a fraudulently altered version of the original request she had
9 sent HUYNH on December 11, 2003. Eileen suspected HUYNH had
10 entered her home and sent a false wire request to Donald Conrad.
11 Eileen believed this because she had an "open door" policy with
12 HUYNH, and HUYNH would visit the Gilmores' residence unannounced on
13 a regular basis. Eileen did not give HUYNH authority to use the
14 Gilmores' home facsimile machine.

15 f. From January 2004 to April 2004, Eileen repeatedly
16 requested HUYNH to sell off securities in ICG and transfer the
17 proceeds to the Gilmores' Wells Fargo account. These requests were
18 hand-delivered written authorizations for HUYNH to wire funds from
19 ICG to Wells Fargo. One such request was co-signed by HUYNH
20 (reference Exhibit E). In April 2004, realizing that she would
21 require an additional \$500,000 in funds in order to pay her 2003
22 capital gains taxes, Eileen wrote a letter to HUYNH requesting that
23 she wire \$500,000. Despite repeated assurances by HUYNH that the
24 wire was en route, the money was never wired to the Gilmores. The
25 Gilmores had also failed to receive any ICG statements since
26 October 2003 from HUYNH.

27 g. On April 29, 2004, Robert Gilmore (Robert) met HUYNH
28 at her office to discuss the wire transfer requests and lack of ICG

1 statements. HUYNH had insisted that the money had been wired.
2 While at HUYNH's office, Robert called Bear Stearns, the purported
3 "clearing house" for ICG as indicated on the "statements" he had
4 received, to verify his account status. Bear Stearns could not
5 verify the Gilmore's account or ICG.

6 h. On May 1, 2004, HUYNH and her husband DUONG "FRANK"
7 PHAN (PHAN) met with the Gilmore's at their residence. Also present
8 at the Gilmore's residence during this meeting was Gilmore family
9 friend, Andy Cravitz. HUYNH admitted that she had entered the
10 Gilmore's residence in December 2003 and had used their facsimile
11 machine to send a falsified wire request to Donald Conrad. HUYNH
12 revealed that she had never used any of the blank checks provided
13 by Eileen to purchase securities, and all of the "earnings" figures
14 and account "statements" had been entirely fabricated by HUYNH.
15 HUYNH told the Gilmore's that the purported "dividend" checks for
16 stock "dividends" the Gilmore's had received were checks drawn from
17 HUYNH's personal bank account. HUYNH told the Gilmore's that the
18 money had been invested in "Chinese companies."

19 i. Eileen told your affiant that she has seen an office
20 area in the lower level of HUYNH's residence at 12416 Ragweed
21 Street. Eileen has observed file cabinets in this office area.
22 Eileen knows that HUYNH would depart from 12416 Ragweed Street via
23 her personal vehicle to hand deliver "dividend" checks and ICG
24 account "statements" to Eileen.

25 7. On July 22, 2004, your affiant interviewed Richard
26 Camarillo, 12626 Via Colmenar, San Diego, California. Camarillo
27 told your affiant the following:

28 a. Camarillo met HUYNH in approximately 2000 through his

1 friend Robert Gilmore. Gilmore and Camarillo had worked together at
2 Qualcomm.

3 b. At the time Camarillo met HUYNH, he recalled HUYNH
4 worked as a broker/dealer for PIM Financial and made stock
5 transactions through Bear Stearns. Camarillo began investing in
6 stocks using HUYNH as a broker/dealer through PIM Financial.

7 c. Between 2000 and present, Camarillo has invested
8 approximately \$500,000 in IN2 and ICG.

9 8. On July 27, 2004 your affiant viewed the following
10 original cleared checks provided by Camarillo:

11 a. Etrade check number 1050, dated June 08, 2004, from
12 "IN2 Technologies Inc." payed to the order of Richard J. Camarillo
13 for the amount of \$25,000.00 (reference Exhibit F). Camarillo
14 believed this check to be a "dividend" check from his investments
15 in IN2. The address listed under "IN2 Technologies Inc." is 12416
16 Ragweed Street, San Diego, California 92129, which is the residence
17 of HUYNH.

18 b. Etrade check number 1034, dated June 20, 2004, from
19 "I2 Cyber Education Inc." payed to the order of Richard Camarillo
20 for the amount of \$46,000.00 (reference Exhibit G) and check number
21 1035, dated June 24, 2004, from "I2 Cyber Education Inc." payed to
22 the order of Richard Camarillo for the amount of \$25,000.00
23 (reference Exhibit H). Camarillo told your affiant that he had
24 never invested in i2 and had no explanation why he was receiving a
25 check from i2.

26 c. UMB Bank check number 1008 dated February 23, 2004
27 from Ready Investments, an account held by Camarillo, was payed to
28 the order of ICG LLC for the amount of \$35,000.00 (reference

1 Exhibit I). Camarillo told your affiant that he believed that ICG
2 LLC and ICG Securities were the same entity as purported by HUYNH.
3 Camarillo believed that the check provided to HUYNH would be
4 invested in stocks at his request.

5 9. On July 27, 2004, Erik E. Barker, Branch Chief, SEC, told
6 your affiant that ICG Securities Ltd is a registered broker/dealer,
7 but ICG LLC is not.

8 10. On July 27, 2004, Janet Rich Weissman, Attorney, SEC told
9 your affiant telephonically that the California Secretary of
10 State's records list ICG LLC as a California active venture fund
11 with HUYNH as the registered agent. ICG LLC is not a registered
12 broker/dealer. The managing member for ICG LLC is IN2. ICG LLC
13 has an Internet Website at www.icgroupllc.com. The website lists
14 the company's San Diego office as 16870 West Bernardo Drive, Suite
15 400, San Diego, California 92127. The website lists LANA HUYNH as
16 the Founder and Chairwoman, Joe Cerbone as the President, and FRANK
17 DUONG as the Chief Operating Officer.

18 11. i2 has an Internet website at www.i2cyber.net. The
19 website lists LANA HUYNH as the Founder and Chairman of the Board,
20 FRANK DUONG as Chief Operating Officer, Jimmy Villalobos as the
21 Financial Advisor, William Shuo Wang as the Vice President and
22 Business Development, China, and Emma Wang as the Financial
23 Manager. The address listed is 16870 West Bernardo Drive, Suite
24 400, San Diego, California 92127.

25 12. IN2 has an Internet website at www.in2tech.com. The
26 website lists Lana HUYNH as CEO and FRANK DUONG as COO. The
27 address listed is 11440 West Bernardo Court, Suite 300, San Diego,
28 California 92127.

1 13. On July 26, 2004, your affiant telephonically interviewed
2 Dwight DeSantis, certified public account, licensed by the State of
3 California. DeSantis told your affiant the following:

4 a. DeSantis is the Gilmore's personal tax accountant.
5 DeSantis recalled trying to obtain Form 1099-B (brokerage)
6 statements for the stock the Gilmore's held in Bear Stearns account
7 number 629-02069 from HUYNH for tax years 2002 and 2003. DeSantis
8 described obtaining the statements from HUYNH was "like pulling
9 teeth," because HUYNH would make excuses why Form 1099-B had not
10 been produced. Eventually, DeSantis received via facsimile a
11 document purporting to be a form 1099-B. DeSantis described the
12 purported 1099-B as "unusual" because it did not follow the typical
13 Bear Stearns statement format.

14 14. On Sunday, July 18, 2004 at about 11:50 AM, your affiant
15 observed a brown Jaguar with California License Plate 4FNM960
16 parked at 16870 West Bernardo Drive. The California Department of
17 Motor Vehicle Records lists California License 4FNM960 as a four
18 door 1994 Jaguar with registered owner PHUONGLAN T HUYNH, 12416
19 Ragweed Street, San Diego, California.

20 15. On Monday, July 27, 2004, your affiant observed a brown
21 Mercedes with California License Plate 1MKE726 parked at 12416
22 Ragweed Street. The California Department of Motor Vehicle Records
23 lists California License 1MKE726 as a four door 1985 Mercedes with
24 registered owner DUONG FRANK PHAN V or LAN HUYNH P, 12416 Ragweed
25 Street, San Diego, California.

26 Technical Computer Information

27 16. As used in this Affidavit, the terms "hardware,"
28 "software," "documentation," and "data security devices" have the

1 following meaning:

2 a. Hardware: Computer hardware consists of all equipment
3 that can collect, analyze, create, display, convert, store,
4 conceal, or transmit electronic, magnetic, optical, or similar
5 computer impulses or data. Hardware includes, but is not limited to
6 units, memory typewriters, and self-contained "laptop" or
7 "notebook" computers); internal and peripheral storage devices
8 (such as fixed disks, external hard disks, floppy disk drives and
9 diskettes, tape drives and tapes, optical storage devices,
10 transistor-like binary devices, and other memory storage devices);
11 peripheral input/output devices (such as keyboards, printers,
12 scanners, plotters, video display monitors, and optical readers);
13 and related communications devices (such as modems, cables and
14 connections, recording equipment, RAM or ROM units, acoustic
15 couplers, automatic dialers, speed dialers, programmable telephone
16 dialing or signaling devices, and electronic tone-generating
17 devices); as well as any devices, mechanisms, or parts that can be
18 used to restrict access to computer hardware (such as physical keys
19 and locks).

20 b. Software: Computer software is digital information
21 that can be interpreted by a computer and any its related
22 components to direct the way they work. Software is stored in
23 electronic, magnetic, optical, or other digital form. It commonly
24 includes programs to run operating systems, applications (like
25 word-processing, graphics, or spreadsheet programs), utilities,
26 compilers, interpreters, and communications programs.

27 c. Documentation: Computer-related documentation
28 consists of written, recorded, printed, or electronically stored

material that explains or illustrates how to configure or use computer hardware, software, or other related items.

d. Passwords and Data Security Devices: Computer passwords and other data security devices are designed to restrict access to or hide computer software, documentation, or data. Data security devices may consist of hardware, software, or other programming code. A password (a string of alpha-numeric characters) usually operates as a sort of digital key to "unlock" particular data security devices. Data security hardware may include encryption devices, chips, and circuit boards. Data security software or digital code keys, which perform certain pre-set security functions when touched. Data security software or code may also encrypt, compress, hide, or "booby-trap" protected data to make it inaccessible or unusable, as well as reverse the process to restore it.

LOCATIONS TO BE SEARCHED

17. Based upon my knowledge, training, experience, and consultation with other law enforcement agents, your affiant believes there is probable cause to believe that evidence of violations of Title 18, United States Code, Sections 1343, 1956, and 371 and Title 15, United States Code, Sections 78j(b) and 77(q)(a) exist at the locations described further in Attachment A.

ITEMS TO BE SEIZED

18. See Attachment B.

SEARCH PROCEDURE

19. Based upon my knowledge, training, and experience, searches and seizures of evidence from computers requires an examination by a qualified computer expert in a laboratory or

1 controlled environment. This is almost always true because
2 of the following:

3 a. Computer storage devices (such as hard disks,
4 diskettes, CDs, DVDs, tapes, laser disks, Bernoulli drives,
5 and others) can store the equivalent of thousands of pages
6 of information. When the user wants to conceal criminal
7 evidence, he or she often stores it in random order with
8 deceptive file names. This requires the searching
9 authorities to examine all the stored data to determine
10 whether it is included in the warrant. This sorting
11 process requires detailed methodical effort and can require
12 days of dedicated work, depending on the volume of data
13 stored. It is impractical to attempt this kind of data
14 search on site.

15 b. Searching computer systems for criminal
16 evidence is a highly technical process requiring expert
17 skill and a properly controlled environment. The vast
18 array of computer hardware and software available requires
19 that even computer experts specialize in some systems and
20 applications. It is difficult to know before a search
21 which expert should analyze the system and its data.

22 c. The search of a computer system is an
23 exacting scientific procedure which is designed to protect
24 the integrity of the evidence and to recover even "hidden",
25 erased, compressed, password-protected, or encrypted files.
26 Since computer evidence is extremely vulnerable to
27 tampering or destruction (both from external sources or
28

1 from destructive code imbedded in the system as a "booby
2 trap"), the controlled environment of a laboratory is
3 essential to its complete and accurate analysis.

4 d. In order to fully retrieve data from a
5 computer system, the analyst needs all magnetic storage
6 devices as well as the Central Processing Unit (CPU). In
7 addition, the analyst needs all the system software
8 (operating systems or interfaces, and hardware drivers) and
9 any applications software which may have been used to
10 create the data (whether stored on hard drives or on
11 external media).

12 20. Inasmuch as this case involves the use of
13 computers actually to commit the offense, rather than just as a
14 storage device, authorization is sought to seize all computers
15 and related equipment used as instrumentalities in the commission
16 of the offense. In order to determine whether encountered
17 computers and related equipment are instrumentalities,
18 authorization is sought to remove all encountered computer
19 systems for off-site review. Off-site review is necessary in
20 this case due to the level of sophistication demonstrated in the
21 commission of the offense described herein. It is not unusual to
22 encounter, in cases involving sophisticated computer used and
23 fraud, encrypted data, booby-trapped computers (wherein data is
24 destroyed using ordinary commands), hidden files, compressed data
25 and unusual modifications to standard operating systems. An FBI
26 employee trained in computer forensic examinations will accompany
27 the search team to ensure that the computer system properly is
28 exited, disassembled and handled. Authorization is sought to

1 retain such computers for up to thirty (30) days to determine
2 whether or not such computers are instrumentalities of the
3 offense. If additional time is needed, further application will
4 be made to the Court. Computers found not to be
5 instrumentalities will be searched for relevant evidence and
6 returned. Contraband, such as password files, will be retained
7 and not returned. Computers used as instrumentalities will be
8 retained.

9
10 21. In my experience, people are known to
11 transport laptop computers and work
12 related documents and papers in their
13 personal or business vehicles.

14 *PCN 1/29/04* *7/29/04*
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CONCLUSION

21. For the foregoing reasons, probable cause exists to search the premises at 12416 Ragweed Street, San Diego, California and 16870 West Bernardo Drive, Suite 400, San Diego, California, and the vehicles with California license plates 4FNM960 and 1MKE726 as provided herein.

REQUEST FOR SEALING

22. Because this is part of an on-going investigation and based on the information set forth in this application, your affiant respectfully requests that this court seal the search warrant, application for search warrant and this affidavit.

Brian C. Niel

Brian C. Nielsen
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me
this 29 day of July, 2004.

United States Magistrate Judge

ATTACHMENT A

16870 West Bernardo Drive, Suite 400, San Diego, California 92127 is situated on the fourth floor of a four story structure located on the corner of West Bernardo Drive and West Bernardo Court. The siding of the building has brown stone tiles. Large black tinted windows clearly define the four separate floors. On the outside of the building facing West Bernardo Drive are large black numbers clearly depicting "16870" and large black letters clearly depicting "University of Phoenix". On the outside of the building facing West Bernardo Court are large black letters clearly depicting "Wachovia Securities".

Suite 400 is described as the fourth floor of 16870 West Bernardo Drive. Outside the elevator to Suite 400 is a foyer with glass doors that lead to a reception desk. Hallways left and right of the reception desk lead to rooms marked with plaques indicating Room Number and the name of the business occupying the room.

The interior of Suite 400 consists of several businesses including the following businesses controlled by PHUONG LAN THI HUYNH: i2 Cyber Education Inc. in Room 416, International Capital Group Securities Ltd in Rooms 443 and 444, International Capital Group LLC in Rooms 409, 410, 411, 412, 413, 414, 415, and IN2 Technologies Inc. The businesses i2 Cyber Education Inc., International Capital Group Securities Ltd, International Capital Group LLC, and IN2 Technologies Inc. are to be searched.

Not to be included in the search are the other businesses located in Suite 400.

ATTACHMENT B

Items to be seized

1. Any and all records that relate to the finances, business practices, and ownership of i2 Cyber Education Inc., International Capital Group Securities Inc., IN2 Technologies Inc., or International Capital Group LLC, which relate to the time period of January 1, 2000 to the present, including but not limited to:
 - a. Financial statements and related work papers;
 - b. General accounting ledgers and journals, with supporting documentation and trial balances;
 - c. Ledgers and journals relating to i2 Cyber Education Inc., International Capital Group Securities Inc., IN2 Technologies Inc., or International Capital Group LLC's receipt of money or property relating to their business practices, including ledgers and journals relating to: sales; accounts receivable; inventory; and cash receipts and supporting documentation such as bills, receipts, and invoices;
 - d. Ledgers and journals relating to disbursements for any reason of money or property held by, or belonging to i2 Cyber Education Inc., International Capital Group Securities Inc., IN2 Technologies Inc., or International Capital Group LLC: purchases; accounts payable, accounts receivable, leases, payroll, and; cash disbursements, with supporting documentation such as bills, invoices, and receipts relating to expenses of i2 Cyber Education Inc., International Capital Group Securities Inc., IN2 Technologies Inc., or International Capital Group LLC;
 - e. Bank Statements, deposit and withdrawal tickets, debit and credit memoranda, wire transfer records, canceled checks, and check stubs;
 - f. Corporate charters and stock or other ledgers relating to ownership of i2 Cyber Education Inc., International Capital Group Securities Inc., IN2 Technologies Inc., or International Capital Group LLC and all agreements to which any owner, director, or officer of i2 Cyber Education Inc., International Capital Group Securities Inc., IN2 Technologies Inc., or International Capital Group LLC is a party;
 - g. Minutes of meetings of the directors or officers of i2 Cyber Education Inc., International Capital Group Securities Inc.,

IN2 Technologies Inc., or International Capital Group LLC and lists of such directors or officers;

h. All correspondence relating to the above, including the envelopes or packages in which the correspondence was mailed or transported;

2. All records relating to the operation of i2 Cyber Education Inc., International Capital Group Securities Inc., IN2 Technologies Inc., or International Capital Group LLC which relate to the time period of January 1, 2000 to the present, including but not limited to:

a. Business plans, forecasts and projections;

b. Contracts, including, but not limited to, promissory notes or security agreements to which i2 Cyber Education Inc., International Capital Group Securities Inc., IN2 Technologies Inc., or International Capital Group LLC is a party;

c. All correspondence relating to the above, including the envelopes or packages in which the correspondence was mailed or transported.

3. Any and all documents, records or other information relating to the creation and existence of trust accounts, in care of i2 Cyber Education Inc., International Capital Group Securities Inc., IN2 Technologies Inc., or International Capital Group LLC.

4. Any and all documents, records or other information which relate to the time period of January 1, 2000 to the present, to include but not limited to, prospectus and brochures, provided to potential investors, foreign currency traders, investment marketing entities regarding i2 Cyber Education Inc., International Capital Group Securities Inc., IN2 Technologies Inc., or International Capital Group LLC and its subsidiaries; and correspondence and other communications between i2 Cyber Education Inc., International Capital Group Securities Inc., IN2 Technologies Inc., or International Capital Group LLC and these entities.

5. Any and all documents, contracts and agreements with potential investors, foreign currency traders, investment marketing entities. These records should include but are not limited to the following:

- a. Commission schedules and/or contracts;
- b. Insurance documentation covering all accounts
- c. Trust account documentation
- d. Memoranda and correspondences

- e. Account statements
- f. Off-shore business accounts
- g. Off-shore business agreements

6. Any and all documents, contracts, correspondence and agreements with i2 Cyber Education Inc., International Capital Group Securities Inc., IN2 Technologies Inc., or International Capital Group LLC clients, investors, traders, investment marketing entities which relate to the time period of January 1, 2000 to the present. These records should include, but are not limited to, the following:

- a. Investor agreements
- b. Trader agreements
- c. Off-shore business accounts
- d. Off-shore business agreements
- e. Investor, trader, off-shore business contact, and bank, names, addresses and phone listings.
- f. Retained copies of all UCC filings

7. To the extent necessary, may seize computer hardware for purposes of obtaining the above information to be returned within 20 days absent further court order.

8. The term "records," "documents," "files," and "information" include all of the foregoing items of evidence in whatever form and by whatever means such records, documents, files or information, their drafts, or their modifications may have been created or stored, including, but not limited to, any handmade form (such as writing or drawing with any implement on any surface, directly or indirectly); any mechanical form (such as tape recordings, cassettes, compact discs, or any information on an electronic or magnetic storage device, such as floppy diskettes, hard disks, backup tapes, CD-ROMs, optical discs, printer buffers, smart cards, memory calculators, electronic dialers, Bernoulli drives, or electronic notebooks, as well as printouts or readouts from any magnetic storage device).

9. Any and all computers or computer systems including, but not limited to, computer processing units and peripheral hardware such as monitors, modems, network hubs, external drives and external digital storage devices (such as Jazz or Zip drives, disks, diskettes, CD-ROM disks, backup tapes, personal digital assistants, and the like), printers, cables and keyboards.

10. Any and all computer software, that is, digital information that can be interpreted by a computer and any of its related components to direct the way they work. This includes but is not limited to programs to run operating systems, applications (like

word-processing, graphics, or spreadsheet programs), utilities, compilers, interpreters, and communications programs.

11. Any and all computer-related documentation, including but not limited to written, recorded, printed, or electronically stored material that explains or illustrates how to configure or use computer hardware, software, or other related items.

12. Any and all computer passwords and other data security devices that are designed to restrict access to or hide computer software, documentation, or data.

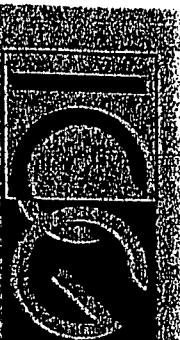
13. In executing the warrant, the agents are authorized to seize the above-described computer system, software, documentation, data, and input/output peripheral devices for processing by a qualified computer specialist in a laboratory or other controlled environment. If after inspecting the seized computer system, software, documentation, data, and input/output peripheral devices, the computer analyst determines that these items are not included in the items to be seized or are no longer necessary to retrieve or preserve the data evidence, the Government will return them to the party from whom they were seized within 10 business days.

14. 1994 Jaguar four door sedan with California License Plate 4FNM960 and VIN SAJKX1743RC693100 with registered owner PHUONGLAN T HUYNH.

15. 1985 Mercedes four door sedan with California License Plate 1MKE726 and VIN WDBAB33C1FA260835 with registered owner DUONG FRANK PHAN V or LAN HUYNH P.

Exhibit A

Exhibit B



CLEARANCE AGENT
 Bear, Stearns & Co., Inc.
 One Metrotech Center North
 Brooklyn, New York 11201-3859
 (212) 277-1000

PHUONG LAN HUYNH

1 of 6

ACCOUNT EXECUTIVE

608

Telephone

(858) 674 - 6650

What's in this Statement

Financial Summary.....	3
Your Portfolio Holdings.....	4
Transaction Detail	6

Your Portfolio at a Glance

TOTAL VALUE OF SECURITIES THIS PERIOD

387,170.00

Cash/
Cash Equivalent

\$1,122,675

\$1,122,675

MONEY MARKET FUND BALANCE

9,480.00

Equities

387,170.00

1,026,422.00

1,026,422.00

Market Value of Your Portfolio

MARGINS

0.00

NET EQUITY THIS PERIOD

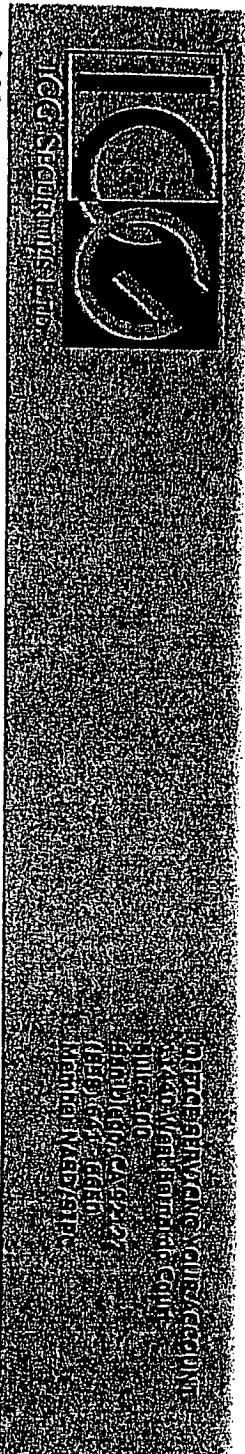
1,726,846.89

NET EQUITY LAST STATEMENT

1,397,310.25

CHANGE SINCE LAST STATEMENT

329,536.64



PHUONG LAN HUYNH

CLEARANCE AGENT

Bear, Stearns Securities Corp.
One Manhattan Center North
Brooklyn, New York 11201-2859
(212) 271-1000

GUIDE TO YOUR STATEMENT

Your statement may contain the following sections:

Your Portfolio at a Glance: Reflects the net equity of your account at the close of the statement period, the net equity of your last statement and any change since the last statement.

Market Value of Your Portfolio: A graph reflecting the change in the market value of your account portfolio from the market value reflected on your last statement (Cash+Cash Equivalent, Equities, Mutual Funds, Fixed Income, Other).

Cash Flow Analysis and Cash Balance Summary: Both show your opening and closing balances. Cash Flow Analysis reflects the categories of cash activity. Cash Balance Summary reflects the cash balances by account type. Opening Balance is the credit or debit carried over from the previous periods closing balance. Closing balance is the combination of the total debits and credits for the statement period together with the opening cash balance. A debit balance (money you owe us) is indicated by a minus sign in these sections.

Income Summary: Reflects the total dividend, interest, and other income amounts for the statement period and year to date. Any tax withheld, margin interest, and miscellaneous charges are included here if applicable.

Distribution Summary: Reflects returns on capital, liquidations, and other income for the statement period and current year.

Retirement Plan: Reflects the contributions received and distributions paid during this statement period as well as for the previous year.

Your Portfolio Allocation: A chart defining your asset allocations (Cash/Cash Equivalent, Equities, Mutual Funds, Fixed Income, Other).

Portfolio Composition: Reflects a summary of cash/cash equivalent, equities, mutual funds, and fixed income for the statement period.

Bonds with 60+ Day Horizon: Reflects bonds that will mature or are subject to redemption within the next 60 days.

Your Portfolio Holdings: Reflects cash and all securities in your account. Estimated annual income is based on the dividend or income expected to be received annually. Accrued interest represents fixed income securities since the last coupon date. There is no guarantee that this interest will be paid by this issuer. Current yield is calculated by dividing the estimated annual income by the market value of the securities and represents an estimated current yield only.

Market Prices/Bond Readings: Prices for determining market values represent estimates. These estimates are obtained from multiple sources, including Bear Stearns, its affiliates and outside services. Pricing estimates may be based on bids, prices within the bid/offer spread, closing prices or matrix methodology that uses data relating to other securities whose prices are more ascertainable to produce a hypothetical price based on the estimated yield spread relationship between securities. Pricing estimates do not constitute a bid for any security. Actual prices realized at sale may be more or less than shown on your statement. Bond ratings are received from outside sources. While we believe our sources for market values and bond ratings to be reliable, we cannot guarantee their accuracy.

Transaction Detail: Reflects all transactions settled or processed for your account this statement period.

Trades Executed But Not Yet Settled: This section will reflect any trades not yet settled by the statement closing date. The settlement date is indicated in the first column.

IMPORTANT NOTES

Dividend Income: Dividends credited to your account may include capital gains, non-taxable dividends and/or dividends on foreign stock. You may wish to consult your tax advisor with regard to your tax liability on these dividend credits.

Financial Statement: A financial statement of our firm is available for your personal inspection at our office, or a copy will be sent to you upon written request.

Methods of Computing Interest on Dabit Balances:

Interest is charged on a day by day basis for any day that there is a net debit balance in your overall account. The calculation is made on a 360-day basis at the rate or rates shown on the statement. Interest rates may be changed from time to time with fluctuating money market rates or for other reasons.

Customer free credit balances may be used in this firm's business subject to the limitation of 17CFR Section 240.15c3-3 under the Securities Exchange Act of 1934. You have the right to receive, upon demand, the delivery of:

- Any free credit balances to which you are entitled
- Any fully-paid securities to which you are entitled
- Any securities purchased on margin upon full payment of any indebtedness to us.

If this is a margin account and we maintain a special memorandum account for you, this is a combined statement of your general account and a special memorandum account maintained for you under Section 220.6 of Regulation T issued by the Board of Governors of the Federal Reserve System. The permanent record of this separate account as required by Regulation T, is available for your inspection.

For Option Accounts: Further information with respect to commissions and other charges related to the execution of listed options transactions has been included on confirmations of such transactions previously furnished to you and such information will be made available to you promptly upon written request.

Reportable to the Internal Revenue Service: As required by law, at year end, we will report to you and to the Internal Revenue Service and to certain states, certain information on sales including short sales, dividends, and various types of interest that have been credited to your account.

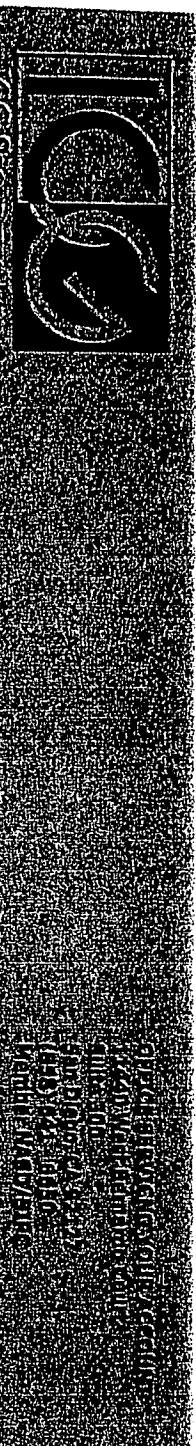
Statement Frequency: Statements will be mailed to customers who have transactions during the statement period affecting money balances and/or security positions. All other accounts will be sent statements at least four times during a calendar year provided that the account contains a money or security balance.

Please promptly notify the office servicing your account in writing of any change of address. The office servicing your account can be found on page 1.

Kindly include your account number(s) on all correspondence.

Your securities account will be protected for the amounts entire net equity (both cash and securities). The first \$50,000 of protection, which includes up to \$100,000 of protection for cash, is provided by SIPC (Securities Investor Protection Corporation) and the balance is provided by a separate excess SIPC bond issued by Travelers Casualty & Surety Company covering accounts maintained at Bear, Stearns

Securities Corp.



3 of 6

Cash Flow Analysis

Income Summary

STATEMENT PERIOD: October 1, 2003
 THROUGH: December 31, 2003
 CLEARANCE AGENT:
 Bear, Stearns Securities Corp.
 One Metrotech Center North
 Brooklyn, New York 11201-3859
 (212) 271-1000
 (631) 427-1000
 (718) 235-1000
 (800) 420-1000

LAST STATEMENT: September 30, 2003
PHUONG LAN HUYNH

THIS PERIOD		THROUGH		THROUGH	
		This Period	Year To Date	Account Number	On File
Opening Balance	820,303.75				
Credit Balance Int.		9,480.00	52,100.00		
Money Fund	150,000.00				
Total		9,480.000	61,580.00		

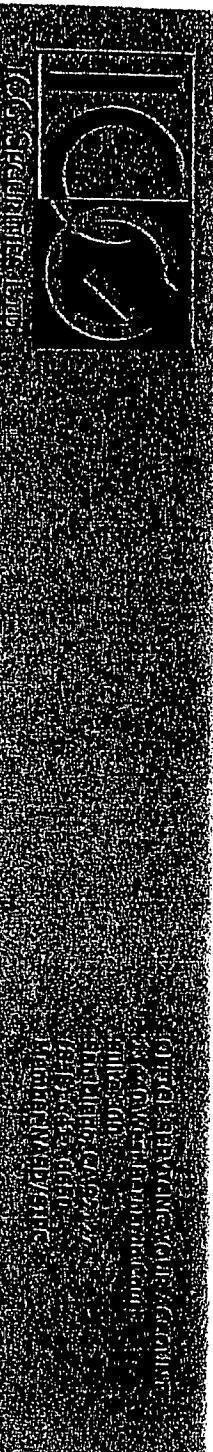
Amount Credited		Portfolio Composition		Income Summary	
		SHORT	LONG	THROUGH	THROUGH
Securities Bought	123,710.00				
Fund Withdrawal	15,000.00				
Amount Debited	597,126.00				
Net Cash Activity	519,373.14				
Closing Balance	\$ 1,339,676.89				

Cash Balance Summary

	OPENING	CLOSING
Margin	458,416.00	
Net Cash Balance	820,303.75	1,339,676.89

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Your Portfolio Holdings



CLEARANCE AGENT
Bear Stearns Securities Corp.
One Metropath Center North
Brooklyn, New York 11201-3859
(212) 277-1000

PHUONG LAN HUYNH

STATEMENT PERIOD October 1, 2003
THROUGH December 31, 2003

ACCOUNT NUMBER On File
TAXPAYER NUMBER On File
LAST STATEMENT September 30, 2003

EQUITIES

EQUITIES AND OPTIONS

DESCRIPTION	SYMBOL/CUSIP	ACT TYPE	QUANTITY	PRICE	MARKET VALUE	ESTIMATED ANNUAL INCOME	CURRENT YIELD (%)
Accelair Entertainment	AKLM	CASH	30,000	0.32	\$9,600.00		
Accelair Entertainment	AKLM	CASH	70,000	0.33	23,100.00		
Acquia	ILA	CASH	20,000	2.62	52,400.00		
Cedar Fair, L.P.	FUN	CASH	7,000	22.66	158,220.00		
UST	UST	CASH	2,000	28.75	57,500.00		
UST	UST	CASH	3,000	28.65	85,950.00		

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Transaction Detail

DATE	TRADE DATE	TRANSACTION	DESCRIPTION	SYMBOL/CLUSTER	QUANTITY	PRICE	DEBIT AMOUNT	CREDIT AMOUNT
10/05/03	10/05/03	DEPOSIT			1	55,000.00		
10/10/03	10/07/03	WITHDRAWAL			1	15,000.00	15,000.00	
10/22/03	10/19/03	SELL	Taco Energy	TECO	10,000	14.40		
10/22/03	10/19/03	MARGIN						
10/29/03	10/26/03	DIVIDEND	Annaly Mortgage	NLY	5,000	1	124,703.50	124,703.50
10/29/03	10/27/03	SELL	Annaly Mortgage	NLY	5,000	0.28		1,400.00
10/30/03	10/27/03	MARGIN						32,400.00
11/03/03	10/31/03	BUY	Eagle Broadband	EAG	40,000	1	124,703.50	35,600.00
11/03/03	10/31/03	SUY	Eagle Broadband	EAG	9,000	0.89		8,010.00
11/03/03	10/31/03	BUY	Eagle Broadband	EAG	41,000	0.89		36,490.00
11/03/03	10/31/03	SUY	Eagle Broadband	EAG	49,000	0.89		43,610.00
11/05/03	11/02/03	DEPOSIT			1	60,000.00		
11/05/03	11/02/03	SELL	Sirius Satellite Radio	SIRI	50,000	2.20		60,000.00
11/05/03	11/02/03	MARGIN			1	78,502.50	78,502.50	
11/05/03	11/02/03	SELL	Sirius Satellite Radio	SIRI	15,000	2.20		33,000.00
11/05/03	11/02/03	MARGIN			1	23,552.50	23,552.50	
11/05/03	11/02/03	SELL	Bristol Meyers	BMY	5,000	25.00		125,000.00
11/05/03	11/02/03	MARGIN			1	51,252.50	51,252.50	
11/05/03	11/02/03	SELL	Cryolife	CRYO	10,000	6.28		62,800.00
11/05/03	11/02/03	MARGIN			1	55,701.50	55,701.50	
11/14/03	11/11/03	SELL	Eagle Broadband	EAG	9,000	1.69		15,210.00
11/14/03	11/11/03	SELL	Eagle Broadband	EAG	41,000	1.69		69,290.00
11/14/03	11/11/03	SELL	Eagle Broadband	EAG	40,000	1.56		62,400.00
11/17/03	11/14/03	DIVIDEND	Cedar Fair, L.P.	FUN	7,000	0.44		3,080.00

CLEARANCE AGENT
Bear, Stearns Securities Corp.
One Meadrowe Center North
Brooklyn, New York 11201-3859
(212) 271-1880

PHIONG LAN HIRVANH

6 of 6

Office of the Secretary of Defense
Washington, D.C. 20330
Telephone: 202-707-0000
Telex: 202-707-0000
FAX: 202-707-0000
E-mail: OASD@DOD.DOD.MIL

Transaction Detail SETTLEMENT

DATE	TRADE DATE	TRANSACTION	DESCRIPTION	SYMBOL/CUSIP	QUANTITY	PRICE	DEBIT AMOUNT	CREDIT AMOUNT
11/22/03	11/19/03	SELL	UST	UST	5,000	35.44	-	177,200.00
12/09/03	12/06/03	SELL	Eagle Broad Band	EAG	49,000	1.45	-	71,050.00
12/19/03	12/16/03	SELL	PLMO	PLMO	250	11.04	-	2,760.00
12/19/03	12/16/03	SELL	PSRC	PSRC	77	2.45	-	1,909.14
12/22/03	12/19/03	DEPOSIT			1	35,000.00	-	35,000.00
12/31/03	12/28/03	DIVIDEND	UST	UST	10,000	0.50	-	5,000.00

***** End of Statement *****

CLEARANCE AGENT

**Bear, Stearns Securities Corp.
One Madrutsch Center North
Brooklyn, New York 11201-3859
(212) 271-1000**

PHUONG LAN HUYNH

STATEMENT PERIOD October 11, 2003

9/23/2002 1:27PM

Open Stocks								
Shares	Symbol	Buy Date	Buy Price	Total	Close Date	Close Price	Current Price	Gain/Loss
100,000.00	CYTP.OB	1/22/02	\$ 0.25	\$ 25,002.50		\$ 0.02	\$ (23,005.00)	
5,000.00	TIVO	2/15/02	\$ 5.44	\$ 27,202.50		\$ 3.20	\$ (11,205.00)	
5,000.00	PALM	2/15/02	\$ 3.34	\$ 16,702.50		\$ 0.93	\$ (12,055.00)	
5,000.00	TIVO	4/12/02	\$ 4.67	\$ 23,352.50		\$ 3.20	\$ (7,355.00)	
5,000.00	VTSS	6/5/02	\$ 5.04	\$ 25,202.50		\$ 1.00	\$ (20,205.00)	
5,000.00	TIVO	6/7/02	\$ 3.75	\$ 18,752.50		\$ 3.20	\$ (2,755.00)	
5,000.00	VASO	6/18/02	\$ 2.51	\$ 12,552.50		\$ 1.64	\$ (4,355.00)	
5,000.00	UST	6/26/02	\$ 34.50	\$ 172,502.50		\$ 29.12	\$ (26,905.00)	
5,000.00	ILA	8/1/02	\$ 7.15	\$ 35,752.50		\$ 4.25	\$ (14,505.00)	
5,000.00	TIVO	8/21/02	\$ 4.00	\$ 20,002.50		\$ 3.20	\$ (4,005.00)	
8,000.00	AOL	8/21/02	\$ 12.50	\$ 100,002.50		\$ 12.01	\$ (3,925.00)	
15,000.00	ERICY	8/21/02	\$ 0.72	\$ 10,802.50		\$ 0.46	\$ (3,905.00)	
10,000.00	ERICY	8/21/02	\$ 0.73	\$ 7,302.50		\$ 0.46	\$ (2,705.00)	
5,000.00	CPB	8/29/02	\$ 23.29	\$ 116,452.50		\$ 21.62	\$ (8,355.00)	
5,000.00	PFE	9/3/02	\$ 31.40	\$ 157,002.50		\$ 28.64	\$ (13,805.00)	
5,000.00	BMY	9/3/02	\$ 23.95	\$ 119,752.50		\$ 24.24	\$ 1,445.00	

9/23/2002 1:27 PM

30,000.00	ERICY	9/5/02	\$ 0.69	\$ 20,702.50		\$ 0.46	\$ (6,905.00)	
7,000.00	UST*	9/19/02	\$ 28.75	\$ 201,252.50		\$ 29.12	\$ 2,585.00	
3,000.00	UST*	9/19/02	\$ 28.65	\$ 85,952.50		\$ 29.12	\$ 1,405.00	

Exhibit C



October 10 through November 12, 2003

Account Number: 037-1481946

Page 2 of 4

89.509

Activity detail

Reserve Deposits

Date	Description	\$ Amount
10/10	WT Fed#02639 Citibank California /Org = lana Huynh Srf# G0032831656401 Trn#031010020275 Rfb#	15,000.00
11/12	Reverse Statement Check Option Charge	2.50
Total deposits		\$15,002.50

Withdrawals

Checks

Number	Date	\$ Amount	Number	Date	\$ Amount	Number	Date	\$ Amount
943	10/16	350.00	945	10/27	675.00			
944	10/29	350.00	946	11/03	300.00			
Total checks								

Other withdrawals

Date	Description	\$ Amount
10/10	Wire Trans Svc Charge - Sequence: 031010020275 Srf# G0032831656401 Trn#031010020275 Rfb#	10.00
10/10	ATM Withdrawal - 10/10 Mach ID 0771D 16901 Bernardo Ctr Dr San Diego Ca 4621	500.00
10/14	ATM Withdrawal - 10/12 Mach ID S101 Poway #2 W/U Uboc Poway Ca 4621	501.50
10/14	Non-Wells Fargo ATM Transaction Fee	2.00
10/16	ATM Withdrawal - 10/16 Mach ID 2127L 12672 Poway Rd Poway Ca 4621	500.00
10/17	ATM Withdrawal - 10/17 Mach ID D090 13536 Poway Roasan Diego Poway Ca 4621	501.50
10/17	Non-Wells Fargo ATM Transaction Fee	2.00
10/17	Check Crd Purchase 10/15 Box Appliance Service 858-2798586 Ca 446024XXXXXX4621 245123990S662Zbrz ?MCC= 7629 121042882DA	231.00
10/20	ATM Withdrawal - 10/20 Mach ID BA3221 *13425 Communityatm Cash Poway Ca 4621	501.40
10/20	Non-Wells Fargo ATM Transaction Fee	2.00
10/20	Check Crd Purchase 10/16 Shell Oil 20462400258 Poway Ca 446024XXXXXX4621 24692169300V1EB07.?MCC= 5542 121042882DA	34.88
10/23	ATM Withdrawal - 10/23 Mach ID D090 13536 Poway Roasan Diego Poway Ca 4621	501.50
10/23	Non-Wells Fargo ATM Transaction Fee	2.00
10/28	ATM Withdrawal - 10/28 Mach ID D090 13536 Poway Roasan Diego Poway Ca 4621	501.50
10/28	Non-Wells Fargo ATM Transaction Fee	2.00
10/29	ATM Withdrawal - 10/29 Mach ID BA3221 *13425 Communityatm Cash Poway Ca 4621	501.40
10/29	Non-Wells Fargo ATM Transaction Fee	2.00
10/30	ATM Withdrawal - 10/30 Mach ID D090 13536 Poway Roasan Diego Poway Ca 4621	501.50
10/30	Non-Wells Fargo ATM Transaction Fee	2.00
10/30	Check Crd Purchase 10/29 Wal Mart Poway Ca 446024XXXXXX4621 24226389E9A7ASZ1Y ?MCC= 5310 121042882DA	278.51
10/31	ATM Withdrawal - 10/31 Mach ID 0771M 16901 Bernardo Ctr Dr San Diego Ca 4621	500.00
10/31	Check Crd Purchase 10/29 Shell Oil 61250222474 San Diego Ca 446024XXXXXX4621 24692169F00JMDBG7 ?MCC= 5542 121042882DA	29.59



Just 12 through September 10, 2003

Account Number: 037-1481946

Page 2 of 4

87,817

Activity detail

Deposits

Date	Description	\$ Amount
08/12	WT Fed#04184 Lana Thi Huynh /Org=lan Huynh Srf# G0032242790201 Trn#030812046146	25,000.00
	Rfb#	25,000.00
08/15	Deposit	49,200.00
08/28	Check Reversal	10,000.00
08/29	Deposit	5,000.00
08/29	WT Fed#04229 IN2 Technologies I /Org=lana Huynh Srf# G0032412782901 Trn#030829050427	43,000.00
	Rfb#	2.50
09/10	Deposit	
09/10	Reverse Statement Check Option Charge	
Total deposits		\$157,202.50

Withdrawals

Checks

Number	Date	\$ Amount	Number	Date	\$ Amount	Number	Date	\$ Amount
931	08/29	61.42	933	08/27	49,200.00	935	09/10	140.00
932	08/15	420,000.00	934	08/28	139.59	936	09/02	300.00
Total checks								\$469,841.01

Other withdrawals

Checks

Date	Description	\$ Amount
08/12	Wire Trans Svc Charge - Sequence: 030812046146 Srf# G0032242790201 Trn#030812046146	10.00
	Rfb#	
08/13	ATM Statement Fee - 08/13 Mach ID 2127L 12672 Poway Rd, Poway, Ca 4621	1.00
08/15	ATM Withdrawal - 08/15 Mach ID 0771D 16901 Bernardo Ctr Dr San Diego Ca 4621	500.00
08/19	ATM Withdrawal - 08/19 Mach ID D090 13536 Poway Roasan Diego Poway Ca 4621	201.50
08/19	Non-Wells Fargo ATM Transaction Fee	2.00
08/19	Check Crd Purchase 08/17 Linens N Things #468 San Diego Ca 446024XXXXXX4621 242753076FPV5A07 ?MCC= 5719 121042882DA	182.02
08/19	Check Crd Purchase 08/17 Linens N Things #468 San Diego Ca 446024XXXXXX4621 242753076FPV7Hpd1 ?MCC= 5719 121042882DA	64.62
08/20	ATM Withdrawal - 08/20 Mach ID 2041X 13438 Poway Rd Poway Ca 4621	200.00
08/21	ATM Withdrawal - 08/21 Mach ID 2127L 12672 Poway Rd Poway Ca 4621	100.00
08/21	Check Crd Purchase 08/19 EXXONMOBIL34 07978471 Poway Ca 446024XXXXXX4621 241640578B018Xpex ?MCC= 5542 121042882DA	38.46
08/25	ATM Withdrawal - 08/23 Mach ID 0771M 16901 Bernardo Ctr Dr San Diego Ca 4621	500.00
08/25	POS Purchase - 08/24 Mach ID 000000 13425 Communitywal-Mart #Poway Ca 4621	188.35
08/25	Check Crd Purchase 08/23 Barnes & Noble #1976 San Diego Ca 446024XXXXXX4621 24445007QJZZQKDB0 ?MCC= 5942 121042882DA	134.30
08/25	Check Crd Purchase 08/23 Borders Books &music#1 San Diego Ca 446024XXXXXX4621 24138297QBAQDRJM0 ?MCC= 5942 121042882DA	114.54
08/26	ATM Withdrawal - 08/26 Mach ID LK277105 14149 Twin Peakcadillypoway Ca 4621	201.50

WELLS FARGO
7

8/11/04 2004
8/11/04

Account Statement

11 through August 11, 2003
Account Number: 037-1481946

Page 1 of 3

84,681

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||||||||||||||||||||||||||||||||
EILEEN GILMORE
ROBERT P GILMORE
17899 JOYAS CT
POWAY CA 92064-1005

Thank you for banking with Wells Fargo. For assistance, call: 1-800-TO-WELLS (1-800-869-3557), TDD number (for the hearing impaired only): 1-800-877-4833. Or write: WELLS FARGO BANK, N.A., P.O. BOX 6995, PORTLAND, OR 97228-6995.

How hard does your credit card work? Let a Wells Fargo credit card work for you. Save money with low introductory rates*, on balance transfers and earn rewards points** with every purchase. To apply for a Wells Fargo credit card call 1-877-302-3768 or visit wellsfargospecial.com and enter keyword: Card Now. *Subject to credit qualification **Wells Fargo Rewards(R) program has a \$19 annual program fee.

gecoach Checking

en Gilmore

Robert P Gilmore

Account Number: 037-1481946

Activity summary

Balance on 07/10	\$356,356.16
Deposits	45,002.50
Withdrawals	- 4,883.68
Balance on 08/11	\$396,474.98

Activity detail

Deposits

Date	Description	\$ Amount
07/28	WT Fed#04162 Phuonglan Thi Huyn /Org= phuonglan Thi Huynh Srf# G0032093013401 Trn#030728043555 Rfb#	15,000.00
08/05	WT Fed#04397 Lana Thi Huynh /Org= lan Huynh Srf# G0032172609301 Trn#030805047930 Rfb#	20,000.00
08/06	WT Fed#04158 Lana Thi Huynh /Org= lan Huynh Srf# G0032183303201 Trn#030806046004 Rfb#	10,000.00
1	Reverse Statement Check Option Charge	2.50
	Total deposits	\$45,002.50

June 11 through July 10, 2003
Account Number: 037-1481946

Page 2 of 4

135,068

WEL
FARG

Activity detail

Deposits

Date	Description	\$ Amount
06/11	WT Fed#04926 Citibank California /Org = phuonglan Thi Huynh Srf# G0031702711101 Trn#030619047586 Rfb#	10,000.00
06/20	WT Fed#05040 Citibank California /Org = phuonglan Thi Huynh Srf# G0031712658201 Trn#030620060149 Rfb#	12,000.00
06/25	WT Fed#05265 Lana Thi Huynh /Org = lan Huynh Srf# G0031764790101 Trn#030625053119 Rfb#	25,000.00
06/26	WT Fed#03655 Citibank California /Org = phuonglan Thi Huynh Srf# G0031773498801 Trn#030626033821 Rfb#	23,000.00
07/10	Reverse Statement Check Option Charge	2.50
Total deposits		\$70,002.50

Exhibit D

(215) 854-1583

Dec. 17, 2003

To Whom It May Concern:

Please wire ¹⁸ \$150,000 from our account #5XP-237772 into our Checking account at Wells Fargo in Rancho Bernardo, Ca ABA # 12-1000-248
acct # 03714-8-1946

Thank you,

Sincerely

Eileen Gilmore

Robert P Gilmore

Don Conrad
Inv. Rep.
IA# 060
(216) 563-2300

Exhibit E

To whom it may concern

Feb 23, 2004

Please wire \$225,000⁰⁰ into our
Checking account at Wells Fargo Bank
in Rancho Bernardo, Ca.

ABA # 12 1000 248, Acct # 03714-

81-946

Address of Wells Fargo Bank:
16901 Bernardo Center Dr.
A.O. Ca 92128
858-487-5323.

Thank you,
Robert P. Belmore
Eileen Belmore
Acct # IGG LLC
629 02 069.

Revid
Lamhart
2/23/2004

Exhibit F

MOVE

IN2 TECHNOLOGIES INC.
12416 RAGWEED ST.
SAN DIEGO, CA 92129-2404

E 3222-8161-7 1050

Date 01/08/2004 1886/1012

Pay to
the order of

Richard J. Camarillo 18-69 \$25,000.00

twenty five thousand 00

Dollars

Security Interest
are included.
Details on back.

E*TRADE Securities, Incorporated
Payable Through
UMB, N.A.
Warsaw, MO
Not for ACH/EFT use

NSP

Phraglanthus

Memo

1012188561635096470193591050 000025000000

© Clarke American

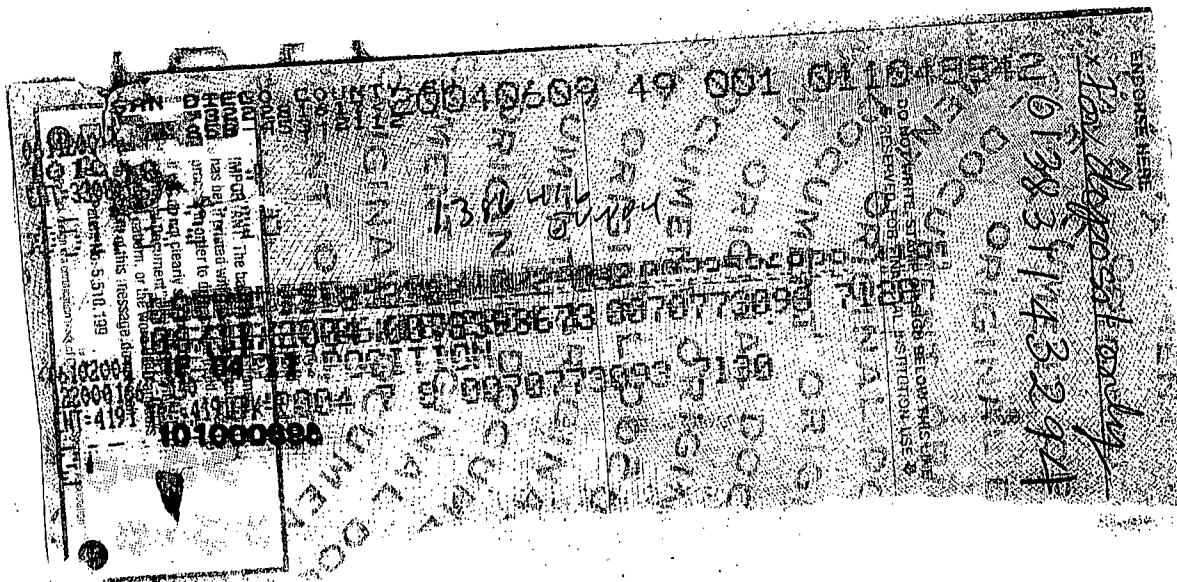


Exhibit G

I2 CYBER EDUCATION INC.
11440 W. BERNARDO CT. STE 300
SAN DIEGO, CA 92127

EXTRADE
FINANCIAL 1034
Date June 20, 2004 32228163
80-1885/1012

Pay to
the order of Richard J Camarillo \$ 46,000.00
forty six thousands 100

EXTRADE Clearing LLC
Payable Through
UMB, N.A.
Waukesha, MO
Not for ACH/EFT use

Memo

10121885616350964998180011034000046000000

© Clarke American

Security features
are included.
Details on back.

NSF Wrong amount

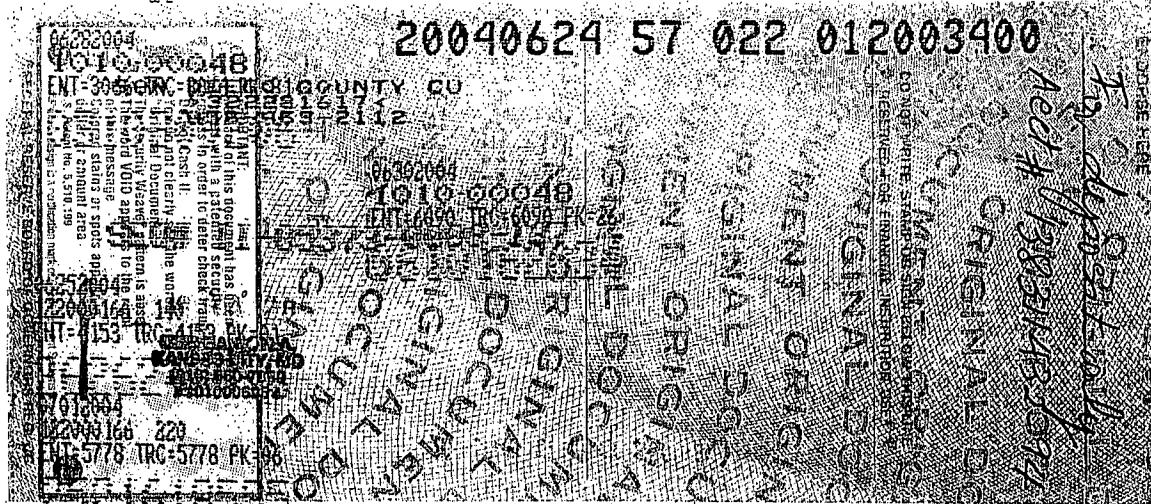
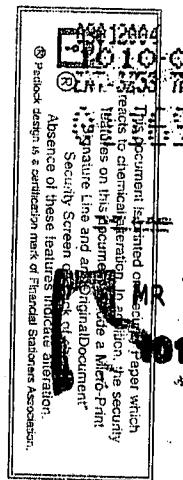


Exhibit H

Exhibit I

READY INVESTMENTS 3885 S DECATUR BLVD LAS VEGAS NV 89103-5855	UMB BANK, N.A.	1008
DATE <u>2/23/04</u>		
PAY TO THE ORDER OF <u>ICG LLC</u>		BO-1885/1012
<u>thirty five thousand four hundred</u> <u>m</u>		\$ <u>35,000.00</u>
		DOLLARS  Security features Details on back.
EXPENSE CODE <input type="text"/>	STERNE, AGEE & LEACH, INC.	
MEMBER NEW YORK STOCK EXCHANGE		
MEMO <u>Ready Investments</u>	<u>Richard L. Carroll</u> MP	
10121885612380006963084 210880003500000		



UNION BANK
MTRY PK 91755
822784 4691524

For deposit only
076 00312.75

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